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T.F.P.

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

A. Is there a prisoner grievance procedure available at your present institution? ☒ • Yes • ☐ No

B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ • Yes • ☐ No

C. If your answer to "B" is Yes:

1. What steps did you take? I wrote two grievances and Ron Drake
of internal affairs

2. What was the result? Captain Sagers took pictures of me and to men
from internal affairs took my taped statement. Sagers took my bloody clothes

D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS (in order listed on the caption)

(1) Name of first defendant: Art Davis

Employed as a Correctional Officer at Delaware Correctional Center

Mailing address with zip code: 1181 Paddock Rd. Smyrna, DE 19977

(2) Name of second defendant: Correctional Officers and Staff to be named later

Employed as Correctional Officers and Staff at Delaware Department of Corrections

Mailing address with zip code: 245 McKee Road Dover DE, 19904

(3) Name of third defendant: Delaware Correctional Center

Employed as a whole at DCC

Mailing address with zip code: 1181 Paddock Rd. Smyrna

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

4. First Corrections Medical Inc.
5. Thomas Carroll (Warden)
6. ~~M.~~ M. Jane Brady
7. Delaware Department of Corrections
8. Delaware Department of Court and Transit

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4. First Corrections Medical Inc.

Po. Box 69370
 Org, Vally, AZ 85757

- 5 Thomas Carroll

Warded at DCC
 1141 Paddock Rd, Smyrna.

6. M. Jane Brady

DE Attorney General

~~1022 West Water St.~~

~~Dover, DE 19901 6750~~

Carvel state office Building
 820 N. French St.
 Wilmington, DE 19801

7. Delaware Department of Corrections

245 McKee Rd
 Dover DE, 19901

8. Delaware Department of Court and Transit

245 McKee Rd
 Dover DE, 19901

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. On 9/22/03 at around 9am - 3pm I was at the New Castle County Court House in Wilmington, DE. I was in a holding cell by myself. The cell door was opened by Officer Davis. I was placed in handcuffs and shackles. Along with the hand cuffs and shackles, I had a chain go around my wrist that the handcuffs hooked up to. Once that was done he placed a black box and padlock to secure the handcuffs and chain together. I realized that I was coming back to DCC, and I didn't see a judge; so I asked Officer Davis why did I come to court. By this time we are walking back to another area where other inmate are waiting to go back. Once near the cell door I ask Officer Davis again why did I come to court, Officer Davis becomes angry and says something smart at which time I reply "look I only asked you a question, why are you acting like a bitch. Officer Davis comes to

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V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. ¹¹ 500,000 Five hundred thousand dollars each for assaulting this plaintiff.

Where I am standing and grabs the front of my shirt and jumpsuit scratching my neck in the process. At the same time he kicks my shackles bringing me down to the ground. Once down Officer Davis drags me 10 to 15 feet to a door where he kicks me once or twice before standing on the side of my face and head while he unlocks a door. By this time its 5 to 10 other guard around. Officer Davis drags me 10 to 15 feet to another door. I see a guard I know, so I say "Edwards Please make him stop, I'm handcuffed!" He tells me to just be quiet. Officer Davis kick me some more. While he is doing this I'm screaming for help, but no one does anything. Once again Officer Davis stands on the side of my face and head while unlocking the other door. This door lead to a holding area with different cells. Officer Davis drags me to the back where he kicks and stomps my face and head repeatedly. One of those kicks splits my eye open. It's blood everywhere. After a few more kicks he drags me to a cell farther back and kicks me once more before locking me in. My eye will not stop bleeding. 10-15 minutes later a Lt. comes with another guard. They take me to another cell up front where I tell them what happened. I need medical help, but all they do is take some paper towels and tape my eye up, and leave me in there for like 1 hour and a half or more. Blood is coming through the paper towel. The Lt. says I will see medical when I get down smyrna. Next 3 officers put me on a van and bring me back down here to smyrna (DC). Once here they hand me over to Officer Ramey, Sgt. Washington, and Sgt. Jones. They call medical. While waiting Sgt. Washington tries to take pictures of my face, but

it has no film or something. A nurse comes and she say I need to see a doctor so I can get stitches. They take me to the infirmary where I still bleed because a doctor was not there. So I got pain medication and spent the night. I got to see a doctor and got stitches the next day. They would not take my picture, so once out of the infirmary I wrote a Grievance and Ron Drake of internal affairs. A couple days later I saw captain Segars where he took pictures of me and took my bloody cloths. With in the next week or two I saw to men from internal affairs where I gave them my statement. I am an inmate at the Delaware Correctional Center. The Defendant are employees of the Delaware Department of Corrections and First Corrections Medical Inc. These defendant are being sued in their individual and official capacities, as they were not performing their duties under the color of state law.


2. \$ 500,000 Five hundred thousand dollars each for cruel and unusual punishment

3. \$ 500,000 Five hundred thousand dollars each for delayed medical treatment

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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13th day of July, 2005.


(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)

4. \$500,000 Five hundred thousand dollars each for neglecting thier duties.

5. \$1,000,000 One million Dollars each for pain and suffering.

6. \$5,000,000 Five million dollars each in Punitive damages

7. Art Davis charged in criminal court with Assault.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13th day of July, 2005

